

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MARYLAND  
3

4 JEFF HULBERT, et al., :  
5 Plaintiffs :  
6 vs. :  
7 SGT. BRIAN T. POPE, : CIVIL ACTION NUMBER:  
8 et al. : 1:18-CV-02317 GLR  
9 Defendants :

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11  
12 Deposition of COLONEL MICHAEL S. WILSON,  
13 taken on Tuesday, August 19, 2019, at 3:34 p.m.,  
14 at Hansel Law, 2514 North Charles Street,  
15 Baltimore, Maryland, before Linda A. Crockett,  
16 Notary Public.  
17  
18 -----  
19

20 Reported by:  
21 Linda A. Crockett

**Exhibit B**

1 what initiated this process?

2 **A. I learned about that phone call probably**  
3 **two or three days after the initial arrest.**

4 Q. Okay. Had you known about that phone  
5 call at the time, and that the -- you agree with  
6 me, it was that phone call that you learned later  
7 that generated the police action ultimately,  
8 right?

9 **A. Perhaps.**

10 Q. Okay, but put the process in motion?

11 **A. Yes.**

12 Q. Had you known at the time that what put  
13 the process in motion was that phone call, would  
14 you have said or done anything differently?

15 MR. FREDERICKSON: Objection. You may  
16 answer.

17 THE WITNESS: Repeat your question.

18 BY MR. HANSEL:

19 Q. Sure. Had you known at the time that it  
20 was that phone call that put the process in  
21 motion, would you have said or done anything

1           **A. Yes.**

2           Q. And the executive protection folks are  
3 employed by the State of Maryland?

4           **A. Yes, the state police.**

5           Q. That's what I was going to get to. The  
6 specific agency is the Maryland State Police, is  
7 that right?

8           **A. Yes, sir.**

9           Q. Once -- when you were in this position  
10 of being thrown under the bus here and you're  
11 looking to figure out where the call came from  
12 and what happened, did you communicate with  
13 anyone to the effect that -- to explain what had  
14 happened, the call came from the Maryland State  
15 Police over at the governor's mansion?

16           **A. No.**

17           Q. To whom did you give that information,  
18 or did you just keep it and wait until something  
19 came up?

20           **A. I gave that information to our**  
21 **secretary, Secretary Churchill.**

1 Q. Secretary Churchill, what do you mean by  
2 secretary? You and I know, but --

3 A. So, he is a governor's cabinet member  
4 and Secretary of the Department of General  
5 Services, which is who we answer to.

6 Q. And other than providing that  
7 information to Secretary Churchill, did you  
8 provide it to anyone else?

9 A. Not to my knowledge.

10 Q. How did you provide it, a letter, an  
11 email, a text?

12 A. Probably a phone call, the best I can  
13 recall.

14 Q. Now if I were in situation like you were  
15 in, in addition to verbally saying it on the  
16 phone I would probably want to make sure the  
17 secretary had the recording and had the records.  
18 Did you also send other information other than  
19 just the call to the secretary?

20 A. I might have sent him an email with the  
21 recording in it. I'm not sure about that.